CUYAHOGA VALLEY NATIONAL PARK
Programmatic Environmental Assessment for Riverbank Management
of the Cuyahoga River

Appendix F

Public Involvement

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SCOPING LETTER DATED OCTOBER 15, 2002

October 15, 2002

<<INSIDE ADDRESS>>

RE: Cuyahoga Valley National Park
Riverbank Management
Programmatic Environmental Assessment

To Whom It May Concern:

The National Park System (NPS) preserves outstanding representatives of the best of America's natural, cultural, and recreational resources of national significance. At Cuyahoga Valley National Park (CVNP), the NPS maintains the Ohio & Erie Canal Towpath Trail and the Valley Railway through the Park. Both of these significant cultural resources are listed on the National Register of Historic Places as Historic Districts. The northern portion of the Ohio & Erie Canal is also listed as a National Historic Landmark. One aspect of maintaining these facilities is to protect them from the erosional effects of the Cuyahoga River, which is also the most significant natural resource within the Park.

The NPS has been repairing areas of streambank erosion on a case-by-case basis by preparing individual, project-oriented Environmental Assessments (EA's). The NPS seeks to develop more holistic and pro-active management measures to address the threat of riverbank erosion on the resources of CVNP. To this end, the NPS is developing a collection of riverbank management measures that will protect the cultural and recreational resources within the Park, while allowing most river processes to continue. To evaluate the potential environmental effects of these measures, the NPS is preparing a Programmatic Environmental Assessment (PEA).

For this study, the NPS has identified two alternatives. One is to continue to manage the threat of riverbank erosion on a project-oriented basis. Streambank erosion repairs would continue to be implemented only when either the Towpath Trail or Valley Railway is in immediate danger of being closed due to the River's erosion, scour and deposition processes. Such measures, called "direct" measures, would be limited to those that repair the bank immediately adjacent to the threatened feature, and would typically consist of a riprap toe constructed to approximately the mean annual flood elevation, and a variety of bioengineering measures above that point to the top of the eroded bank.

The other alternative is the Riverbank Management Alternative. In addition to constructing direct measures for the highest priority projects, a larger number of less intrusive, direct and indirect measures would be implemented at locations where the progress of riverbank erosion has not yet threatened the Towpath Trail or Valley Railway, but may be expected to threaten

these resources in the future. In addition to the direct measures, the Riverbank Management Alternative would apply some or all of the following "indirect" measures:

1. Evaluate if there are locations where moving the Towpath Trail and/or Valley Railway would be a viable option for protecting these recreational resources without causing an adverse effect on cultural resources;

2. Maintain and augment a healthy riparian corridor adjacent to the river's top of bank. Where existing vegetation is sparse or unhealthy, plant native tree species to establish a fully-functional riparian corridor and buffer. Where river oxbows are threatened by meander cutoffs, establish tree screens to stabilize the riverbank;

3. Where erosion is active, but the top of riverbank is located a distance from the resource, utilize large woody debris delivered by the River to slow or halt erosion and to enhance aquatic habitat (root wads, tree revetments, engineered log jams);

4. Where woody debris has become grounded or jammed, and is redirecting flows into the riverbank, reconfigure the debris to direct flow away from the riverbank; and

5. In order to preempt bank erosion and failures, consider the removal of trees that are greater than 9 inches in diameter and greater than 50% undercut and/or are tilted more than 45 degrees.

6. Where conditions permit, experiment with bioengineering techniques and innovative use of rock such as bendway weirs, spurs, and groins.

Certain techniques and materials that **will not be used** for protection of the Towpath Trail or Valley Railway under the Riverbank Management Alternative include pre-cast concrete blocks or articulated mattresses, gabions, sheet piling, and concrete retaining walls. Only natural materials, such as rock, plantings, and large woody debris, will be visible following construction of these measures.

The attached figure shows the portion of the Cuyahoga River within CVNP. The PEA will include 36 sites located throughout this area. Although 36 sites currently identified, the PEA will address the entire reach of river through CVNP and new areas of concern may be identified in the future.

The PEA will identify and analyze potential impacts to the natural and man-made environment resulting from these alternatives. Issues identified to be analyzed include:

- historic and cultural resources,
- the National Inventory River status of a segment of the Cuyahoga River in the CVNP,

- wetlands,
- floodplains,
- water quality,
- streamflow characteristics,
- federally/state listed endangered or threatened species,
- wildlife,
- visitor experience,
- health and safety factors, and
- aesthetic resources.

The National Park Service intends to be the lead agency for this project in accordance with Section 1501.6 of the Council on Environmental Quality (CEQ) regulations (see http://ceq.eh.doe.gov/nepa/regs/ceq/toc_ceq.htm). Federal and State agencies that have jurisdiction by law or special expertise with respect to any environmental issue are requested to be *cooperating agencies* as described in that section of the CEQ regulations.

As part of the process for determining the scope of issues to be addressed in the PEA, and for identifying the important issues related to the proposed action, we request your comments on these issues and any other issues that you can identify as pertinent. We intend to use your comments to:

Identify the range of alternatives and impacts and the important issues to be addressed in the PEA;

Identify and eliminate from detailed study the issues which are not important or which have been covered by prior environmental review; and

Identify other environmental review and consultation requirements.

We look forward to your comments and response to this request. If you have any questions or would like to discuss in more detail the project, please contact Janet Popielski (440) 546-5979. Please forward your comments to Janet by **November 8, 2002**.

Sincerely,

/s/ Wm Carroll

for John P. Debo, Jr.
Superintendent

Attachment

CUVA:Jpopielski:jab:10/11/02:ext.5979:EA.doc

CUYAHOGA VALLEY NATIONAL PARK
Programmatic Environmental Assessment for Riverbank Management
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Public Involvement

LIST OF RECIPIENTS OF SCOPING LETTER

Richard Ruby
Army Corp of Engineers
1776 Niagara Street
Buffalo, NY 14207-3199

William Snow, Administrator
Bath Township
3864 W. Bath Road
Bath, OH 44210-1188

Randolph Bergdorf
Chaiman, Board of Trustees
Boston Township
P.O. Box 123
Peninsula, OH 44264-0123

Honorable Donald L. Plusquellic, Mayor
City of Akron
200 Municipal Building
Akron, OH 44308

Honorable Jerry N. Hruby, Mayor
City of Brecksville
9069 Brecksville Road
Brecksville, OH 44141

Honorable Don L. Robart, Mayor
City of Cuyahoga Falls
2310 Second Street
Cuyahoga Falls, OH 44221-2538

Honorable Fred P. Ramos, Mayor
City of Independence
6800 Brecksville Road
Independence, OH 44131

Honorable Randall Westfall, Mayor
City of Valley View
6848 Hathaway Road
Valley View, OH 44125-4799

Thomas Stanley
Cleveland Metroparks
4101 Fulton Parkway
Cleveland, OH 44144

Thomas J. Hayes, County Administrator
County of Cuyahoga County
Administration Building
Cleveland, OH 44113

Honorable Timothy Davis, Executive
County of Summit County
175 South Main Street
Akron, OH 44308

~~Jan Rybka~~, Program Manager Kelly Danczak
Cuyahoga River RAP
1299 Superior
Cleveland, OH 44114

Nancy Howell
Cuyahoga Soil and Water Conservation District
6100 West Canal Road
Valley View, OH 44125

Deb Yandala, Director
Cuyahoga Valley National Park Association
3675 Oak Hill Road
Peninsula, OH 44264

Doug Cooper, Executive Director
Cuyahoga Valley Scenic Railroad
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Peninsula, OH 44264

Elaine Marsh
Friends of the Crooked River
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Akron, OH 44333

Keith Shy
Metro Parks, Serving Summit County
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Jeff Herrick
ODNR Wildlife Division
912 Portage Lakes Drive
Akron, OH 44319

Tim Donovan, Director
Ohio Canal Corridor
P.O. Box 609420
Cleveland, OH 44109

Amos J. Loveday, Jr.
Ohio Historic Preservation Officer
Ohio Historical Society
567 East Hudson Street
Columbus, OH 43211-1030

L.F. Luttner
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25089 Center Ridge Road
Westlake, OH 44145

Honorable Raymond C. McFall, Mayor
Village of Boston Heights
45 East Boston Mills Road
Hudson, OH 44236-2106

Gary Smillie, Hydorlogist
NPS – Water Resource Division
1201 Oakridge Drive, Suite 250
Fort Collins, CO 80525

Darwin Kelsey
Cuyahoga Valley Countryside
Conservancy
2179 Everett Road
Peninsula, OH 44264

Jennifer Windus
ODNR – Division of Natural Area and
Preserves
1889 Fountain Square Court
Columbus, OH 43224

Dan Rice, Executive
Ohio and Erie Canal Corridor Coalition
520 South Main Street, Suite 2541
Akron, OH 44311

Bob Davic
Ohio EPA
2110 East Aurora Road
Twinsburg, OH 44087

Joan Hug-Anderson
Summit Soil and Water Conservation
District
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Cuyahoga Falls, OH 44221

Angela Boyer
U.S. Fish & Wildlife Service
6950 Americana Parkway, Suite H
Reynoldsburg, OH 43069

Honorable Steven J. Craig, Mayor
Village of Peninsula
P.O. Box 177
Peninsula, OH 44264

Randall L. Keitv, P.E., Conservation
Engineer
ODNR – Division of Soil and Water
Conservation
NRCS Tech Center
803 E. Washington Street, Suite 210
Medina, OH 44256

The Honorable Dennis Kucinich
U.S. House of Representatives
Washington, DC 20510

The Honorable Stephanie Tubbs-Jones
U.S. House of Representatives
Washington, DC 20510

Dee Ketchum
Chief, Delaware Tribe
220 North Virginia
Bartlesville, OK 74003

Bruce Gonzalez
Chief, Delaware Tribe of Western Oklahoma
P.O. Box 825
Anardarko, OK 73005

Floyd Leonard
Chief, Miami Tribe of Oklahoma
P.O. Box 1326
Miami, OK 74355

Jennifer Makaseah
NAGPRA Coordinator
Absentee-Shawnee Tribe of Oklahoma
2025 Gordon Cooper Drive
Shawnee, OK 74801-9381

Larry Angelo
Ottawa Tribe of Oklahoma
P.O. Box 110
Miami, OK 74355

Jerry R. Dillner
Attn: Ms. Roberta A. Smith, Cultural Specialist
Seneca-Cayuga Tribe of Oklahoma
R2301 E. Steve Owens Blvd.
Box 1283
Miami, OK 74355

Kathleen Mitchell
Tribal Historic Preservation Office
Seneca Nation
The Seneca-Iroquois National Museum
794 Broad Street
Salamanca, NY 14779

Leonard Bearskin
Chief, Wyandotte Nation
P.O. Box 250
Wyandotte, OK 74370

Charles Enyart
Chief, Eastern Shawnee Tribe of Oklahoma
P.O. Box 350
Seneca, MO 64865

Ron Sparkman
Chairman, Shawnee Tribe
P.O. Box 189
Miami, OK 74355

Adam Rudolph
2024 Gelnco Avenue
Venice, CA 90291

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LISTING OF RESPONDENTS AND THEIR

COMMENTS/RESPONSES

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Listing of Respondents and Their Comments/Responses

The following table contains a listing of respondents to the Scoping Letter and appropriate response numbers to their comments. The table refers to the comment received and the response to that comment by a designated "comment/response number." Following this section are copies of the comments with the comment numbers indicated on the comments. The following section includes the responses by number.

Agency Name	Comment/Response Numbers
Cleveland Metroparks	1, 2, 3
City of Cuyahoga Falls	4
U.S. Environmental Protection Agency	2, 5
Cuyahoga Soil and Water Conservation District	5, 6, 11
Summit County, Ohio	5, 7, 8
Ohio Historic Preservation Office	1, 3, 5, 7, 10, 12
MetroParks Serving Summit County	No response needed
Wyandotte Nation	No response needed
U.S. Fish and Wildlife Service	No response needed
Ohio Department of Natural Resources	No response needed

CUYAHOGA VALLEY NATIONAL PARK
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COMMENTS RECEIVED

Cleveland Metroparks

Administrative Offices
4101 Fulton Parkway
Cleveland, Ohio 44144
(216) 351-6300
FAX (216) 635-3286
TTY (216) 351-0808

21 October 2002

Ms. Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Dear Ms. Popielski:

Thank you for the opportunity to comment on the streambank erosion Programmatic Environmental Assessment (PEA) under consideration by Cuyahoga Valley National Park. Tom Stanley, Chief of Natural Resources, is out of the office for ten days and requested that I respond to your request for comments on this issue.

Use of a PEA, rather than the piecemeal, individual assessments that have been traditionally used to evaluate and remedy streambank erosion problems within the national park, is certainly a more reasonable, long-term approach to this issue. In addition, the indirect measures tentatively proposed under the PEA generally appear to be viable, environmentally sound solutions to streambank erosion (but, see below). However, we have several broad suggestions for the proposed PEA.

First, the PEA must include *a clearly elucidated process for better understanding the ultimate source or cause of the erosion problem*, not simply a series of potential alternatives for reducing or halting the erosion. Developing corrective actions to reduce streambank erosion in the absence of a firm understanding of *why* the river is eroding a particular site, will lead to a perpetual and wasteful "treatment of the symptom and not the cause."

Second, the PEA must include *development of a process for distinguishing between natural river activity and those caused substantially by factors that originate outside of the river's historical functions, processes, and patterns.* The PEA and subsequent national park actions and policies should recognize a critical component of CVNP's enabling legislation: to protect and maintain the natural functions and processes of the Cuyahoga River. As you know, the meanders of the "Crooked River" developed over millennia through active streambank erosion. Not having a formal and defensible decision-making process in place to consider natural versus unnatural river activity in implemented streambank actions could lead to unnecessary inconsistencies with stated park purposes.

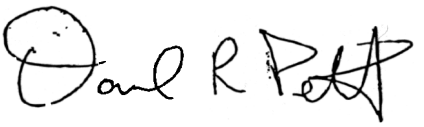
Third is the need for the PEA to recognize the need for *development of a lucid, scientifically sound decision-making process* for determining the most appropriate course of action for each erosion site. This approach helps ensure that consistent, defensible actions are implemented by the national park. In addition, confidence in park actions will be increased through public understanding of *how* decisions are made.

The above three suggestions presume that CVNP has or will develop a vision for management and conservation of the river segment under its jurisdiction. Only within the context of that vision can your actions and decision-making processes be effectively developed and implemented.

The applicability and legitimacy of the potential direct and indirect actions outlined in your letter depend upon the context within which each action is applied. Hence, it is difficult for us to make *a priori* determinations about each prospective action without knowing how decisions are to be made, where exactly those actions will be applied, and what the stated objectives are for each location. In general, all of the indirect measures you propose *can* be useful tools in streambank stabilization, but the process (as above) the national park uses to make decisions at each site should be of greater concern to you and your cooperating agencies.

Do not hesitate to contact me (216-635-3242; drp@clevelandmetroparks.com) if you have any questions about these suggestions. Thank you again for the opportunity to comment.

Sincerely,



Daniel R. Petit, Ph.D.
Manager, Natural Resources Research

City of Cuyahoga Falls

Office of the Mayor
2310 Second Street
Cuyahoga Falls OH 44221-2583

Don L. Robart
Mayor

Phone: 330.971.8200
Fax: 330.940.2327
E-Mail: Mayor@CityofCF.com

November 8, 2002

National Park Service
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Attention: Janet Popielski

RE: Riverbank Management
Programmatic Environmental Assessment

Dear Ms. Popielski

The City of Cuyahoga Falls is pleased to see that the Cuyahoga Valley National Park is working toward such an environmentally directed approach for riverbank erosion, and the City supports your efforts. The only questions that the City has are:

1) Will the Programmatic Environmental Assessment also look at the local road system near the river? (4)
2) If sites are identified in the PEA along the local roads, who will be responsible for implementing the Riverbank Management alternative?

If you have any questions please contact Peter Bell, my City Engineer, at 330-971-8180

Sincerely,

D. Robart

Don L. Robart, Mayor

PEB/mp

Cc Peter Bell, City Engineer

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
CLEVELAND OFFICE
25089 CENTER RIDGE ROAD
WESTLAKE, OH 44145-4170

November 15, 2002

Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Ms. Popielski:

We would like to take this opportunity to thank you for giving the U. S. EPA the chance to offer input on this most important decision process that the CVNP is about to engage in. Stream management is becoming a much better understood science with many experts and resources available to plan for successful projects.

Your letter states that the NPS is looking at two alternatives. We feel that your proposal to study the river as a system overall throughout the park would be the better alternative. We feel that studying the river in its entirety will provide the greatest benefit to the NPS in terms of the potential labor and economic savings. Additional benefits will be for the aquatic animals, aquatic habitat, and water quality for the river.

Most stream experts seem to agree it is better to work with the stream rather than against it. It would also be wise to look at the upstream communities as contributors to the river in terms of water quantity that will add over time. As land is developed in Geauga, Portage and Summit counties there will be added contributions of storm water to the river during storm events. This added flow to the stream can affect the decisions made on streambank protection.

Streams are dynamic systems in a constant state of flux. At times of bankfull or greater flow events streams create and cutoff meanders. These cutoff meanders, known as oxbows, often provide new habitat areas for aquatic life and provide additional floodplain area for the stream. It may be wiser to allow the stream to cut off meanders to create new oxbow lakes or to allow the stream to reuse an oxbow for its channel if this will not damage the infrastructure of the Towpath Trail or the Valley Railway.

We would also appreciate if you would keep U. S. EPA Region V informed of decisions and your progress in this area. If we can be of further assistance or if you have additional questions please contact me at 440-250-1714.

Thank you,

Paul J. Novak, Jr.
geologist

Cuyahoga Soil and Water Conservation District

6100 West Canal Road • Valley View, Ohio 44125-3330 • Phone: 216/524-6580 • FAX: 216/524-6584

November 7, 2002

John P. Debo, Jr.
National Park Service
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Dear Mr. Debo:

The Cuyahoga Soil and Water Conservation District (SWCD) strongly supports your effort to create the Riverbank Management Alternative of your Programmatic Environmental Assessment. Your proposal to reduce stream bank erosion on National Park property while enhancing wildlife habitat reflects a more proactive approach to river management.

Some suggestions we would like to encourage include the following

- The protection and possible habitat improvement projects for all streams located with the National Park boundary, not just the main-stem of the Cuyahoga River. Studies show that the health of our major river systems is dependent on the health of the tributaries, wetlands and headwater streams in the watershed.

  For indirect measure #2, we recommend the consideration of allowing the river to recapture oxbows where appropriate. Rivers like the Cuyahoga River typically meander (Rosgen "C" stream) within their belt width. This meander pattern is important for slope reduction and energy dissipation, which leads to reduced stream bank erosion and improved in-stream habitat. For more information, Andy Ward, with Ohio State University, and Dan Mecklenburg, with Ohio Department of Natural Resources, have created a great reference guide for calculating belt widths.

The restoration of floodplain areas wherever possible due to their benefits of flood reduction, decrease in stream bank erosion, removal of pollutants (dissolved and particulate), and enhancement of in-stream habitat. (5)

For indirect measure #5, we generally recommend cutting down trees that are in danger of pulling in the stream bank, but we suggest that the remaining root wad be left in place whenever possible. We recognize that this option is not available for certain types of trees and when the bank will collapse, no matter what measures are taken. (11)

Please let us know if we can be of assistance in your efforts

Sincerely,

Janine Rybka
District Administrator

SUMMIT COUNTY, OHIO

JAMES B McCARTHY, EXECUTIVE

October 31, 2002

John P. Debo, Jr.
Superintendent
in care of Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH. 44141

RE: Cuyahoga Valley National Park
Riverbank Management
Programmatic Environmental Assessment

Dear Mr. Debo:

I am responding on behalf of Summit County Executive, James B. McCarthy, to your letter of October 15, 2002 asking for our comments on the proposed Cuyahoga Valley National Park Riverbank Management Programmatic Environmental Assessment (PEA).

Important issues to be addressed in the PEA include the range of alternatives. Since Summit County recently passed a Summit County Riparian Setback Ordinance (May 29, 2002), that applies to all lands within unincorporated areas that are within the jurisdiction of Summit County; it would be of interest to see that enough concentration is given in the proposed alternatives to establishing a healthy riparian corridor that follows the Summit County recommendations for the protection of the Cuyahoga River. Included is a copy of the Summit County Riparian Setback Ordinance Fact Sheet.

Less intrusive measures such as providing effective riparian buffers and planting native tree species where vegetation is sparse, to establish a fully functional riparian corridor and buffer, will likely be more environmentally sound than the usual engineering type solutions to erosion control problems. It is recommended that the proposed alternatives focus on the least intrusive control measures to control the streambank erosion problems in terms of the range of alternatives.

We are interested in receiving more information pertaining to the following "indirect measure" listed on page two of the October 15th letter from you. It states," evaluate if there are locations where moving the Towpath Trail and/or Valley Railway would be a viable option for protecting these recreational resources without causing an adverse effect on cultural resources." Since so many Plans have been made around the existing Towpath Trail, it is recommended that much consideration be given and input received

(7)

PLANNING COMMISSION
175 S. MAIN STREET - AKRON, OHIO 44308-1306
330.643.2551 - FAX: 330.643.2886
www.co.summit.oh.us

from potentially affected organizations before the Towpath Trail would be moved to any great extent. It is hard to understand from the very brief description given what will be involved in your analysis of potentially moving the Towpath Trail and/or Valley Railway and/or how much relocation may be proposed.

Your letter of October 15th lists water quality as being one of the issues to be analyzed in the PEA. We would recommend that this should be done using not just chemical water quality data but using the full spectrum of Ohio Water Quality Standards. These Ohio Water Quality Standards criteria include numeric values for the Index of Biotic Integrity (IBI) and the Modified Index of Well-Being (MIwb), both of which are based on fish assemblage data, and the (ICI), which is based on macro-invertebrate assemblage data.

We would recommend that additional consultation requirements be added to this PEA. Since so many agencies have been involved in plans for the Towpath Trail and water quality in the Cuyahoga River, we recommend that a Steering Committee of Agencies be used as a review mechanism to evaluate possible alternatives. We recommend that you include representatives from the Northeast Ohio EPA Division of Surface Water, the Summit Soil and Water Conservation District, MetroParks Serving Summit County, the Summit County Department of Community and Economic Development; Planning Division, and the Ohio & Erie Canal Corridor Coalition on your Steering Committee.

Please note, the Summit County G.I.S. database is available for your use in evaluating environmental alternatives. For more information on our G.I.S. database, please call Joe Reichlin at 330-643-8364. If you have any questions concerning our comments, please call Susan DeChant at 330-643-2005.

Sincerely,

James W. Oberdorfer, Deputy Director, Planning
Summit County Dept. of Community and Economic Development

APPROVED _____
James B. McCarthy, Summit County Executive
Date: 10/31/02

CC: Joseph Migliorini, Director, Depart. of Community and Economic Development
Susan DeChant, Comprehensive Planner
Joe Reichlin, G.I.S. Coordinator

Enclosure

THE SUMMIT COUNTY RIPARIAN SETBACK ORDINANCE: A FACT SHEET

A healthy riparian area in Summit County.

What are Riparian Areas and Setbacks?

The word "riparian" means "stream-side" and refers to land that runs adjacent to streams and rivers. **Riparian areas** extend beyond streambanks and are at least periodically influenced by flooding. Riparian areas—when large enough and managed in a "natural" vegetated state—help to stabilize banks, limit erosion, reduce flood size flows and filter and settle out runoff pollutants. **Riparian Setbacks** are distance lines set back from each bank of a stream to protect the riparian area and stream from impacts of development, and streamside residents from impacts of flooding and land loss through erosion.

The Riparian Setback Ordinance:

Summit County Council has adopted a Riparian Setback Ordinance (Legislation # 2002-154) which will require setbacks for newly constructed buildings along all streams within unincorporated areas of the county. The entire document can be viewed at: http://www.co.summit.oh.us/council/pdfs/legislation/2002/2002-154.pdf

The ordinance is geared towards new development and only addresses existing landowners who wish to expand their home or operation that currently lies within the setback areas.

The purpose of the Riparian Setback Ordinance legislation is to protect the health, safety, and welfare of Summit County residents and the water quality of the streams.

Which Areas and Streams are Affected:

This legislation applies to all lands within unincorporated areas that are within the jurisdiction of Summit County. Streams affected by this ordinance must: 1). Meet the ordinance's definition of a stream , which is "A surface watercourse with a well-defined bed and bank, either natural or artificial, which confines and conducts continuous or periodical flowing water in such a way that terrestrial vegetation cannot establish roots within the channel," and 2). Appear on at least two of three resource maps, which are available for viewing at the Summit Soil and Water Conservation District:

- The United States Geological Survey Topographical map
- The Summit County Riparian Setback map (newly created by Summit County Planning Dept)
- The Soils maps located in the Soil Survey for Summit County, Ohio, USDA, NRCS.

The Setback Widths:

Setback distances are established from the edge of streams in which the riparian areas are to be left as natural as possible. A riparian setback, when sized and vegetated properly, allows room for riparian areas to disperse the volume and erosive force of floodwaters. The minimum setback widths are:

- 300 feet on each side of all streams draining an area greater than 300 sq. mi.
- 100 feet on each side of all streams draining an area greater than 20 sq. mi. and up to 300 sq. mi.
- 75 feet on each side of all streams draining an area greater than 0.5 sq. mi. (320 acres) and up to 20 sq. mi.
- 50 feet on each side of all streams draining an area greater than 0.05 sq. mi. (32 acres) and up to 0.5 sq. mi. (320 acres).
- 30 feet on each side of all streams draining an area less than 0.05 sq. mi. (32 acres).

If the 100-year floodplain is wider than the designated setback, the setback width will increase to meet the 100-year floodplain. Setback widths will also increase in areas where steep slopes affect both the safety of proposed structures and the water quality of the stream.

For the purposes of this legislation, grassy swales, roadside ditches, drainage ditches created at the time of a subdivision to convey stormwater to another system, tile drainage systems, and stream culverts are not regulated.

Problems arise when structures are built too closely to streams.

How It All Started:

The need for riparian setbacks arose from the natural tendency for stream channels to change shape and location over time. These dynamic processes are accelerated in developing urban watersheds (drainage areas) where the volume and velocity of stormwater runoff increases because impervious surfaces, such as concrete and rooftops, prevent it from soaking into the ground.

Stormwater runoff also picks up pollutants in its path, such as lawn chemicals and residue from cars. The high velocity of increased stormwater volume tears away at streambanks, sending your backyard (and often what is built upon it) downstream.

Over the years, Summit Soil and Water Conservation District (Summit SWCD) has been contacted by riparian landowners who have experienced property damage from flooding and/or loss of land from streambank erosion. Often the problems centered on structures being constructed too closely to streams. Riparian setbacks offered a viable solution since they provide room along streams to slow the velocity of floodwaters and to store the overflows. The setbacks also allow a "buffer" zone to filter pollutants from the stormwater.

The ordinance provides the uniformity and consistency needed to successfully manage riparian areas throughout the townships of Summit County. Riparian setbacks afford protection to riparian areas that return benefits to <u>all</u> community residents. The benefits of improved riparian areas and water quality within a community include, but are not limited to:

Physical improvements: Increase protection of the health, safety, and general welfare of the residents by restoring and maintaining the physical, chemical, and biological integrity of the water resources and their channels and reduction of flooding, erosion and property loss.

Economic improvements: Preserve land characteristics (lot size, shape, and integrity), sustain or increase property values because of aesthetic enhancements, help to keep community costs low, reduce infrastructure costs, and decrease the reliance on engineered solutions. The overall costs associated with protection of riparian areas are typically lower than expenses of restoration projects.

Recognition of Good Stewardship: Communities choosing to incorporate Best Management Practices into law are being acknowledged for their efforts, especially by neighboring communities downstream.

Clean Water Act amendments: Riparian setbacks are tools that will help to satisfy upcoming requirements for municipalities and townships to improve the quality of stormwater entering our waterways.

Effective Date:

The Riparian Setback Ordinance is enacted May 29, 2002. Structures or uses existing within the setback areas on or before this date are "grand fathered in," but expansions are limited. Preliminary plans for new construction that has been approved prior to May 29, may also continue.

For more information, please contact the Summit Soil and Water Conservation District at 330-929-2871.

Ohio Historic Preservation Office

567 East Hudson Street
Columbus, Ohio 43211-1030
614/ 298-2000 Fax: 614/ 298-2037

Visit us at www.ohiohistory.org/resource/histpres/

OHIO HISTORICAL SOCIETY
SINCE 1885

December 26, 2002

Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH 44141

Re: Cuyahoga Riverbank Management
Cuyahoga Valley National Park, Cuyahoga and Summit Counties, Ohio

Dear Ms. Popielski,

This is in response to correspondence from your office dated October 15, 2002 (received October 21) regarding the above management program. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The correspondence proposes the development of a programmatic environmental assessment to consider ways of more efficiently responding to threats to environmental and cultural resources along the Cuyahoga River from erosion. We believe that ongoing consultation on the documentation standards and review process for these types of projects will be beneficial. We also believe that the development of a programmatic approach to erosion control will have long term benefits for the protection of cultural resources.

As noted in the correspondence, there are two historic properties where there are often threats from erosion. There are also many other cultural resources along this corridor that will benefit from carefully designed erosion control measures. Please keep in mind that some of these cultural resources have not yet been identified. In addition to avoiding costly preservation at known historic properties, we believe that pro-active measures along the stream bank may avert costly measures to identify and perhaps salvage important, but not yet identified, archaeological sites. (12)

The correspondence lists a number of techniques that will be emphasized and also lists several techniques that will not be used in erosion control measures. As more fully discussed below, we feel that a programmatic approach should be based on broader statements and objectives. The list of techniques that will be emphasized provides a good starting point. It will be important to add details for each of the techniques to describe how the work will be implemented and examples of the kinds of situations most appropriate for the technique. We agree that the techniques that are listed under the heading of techniques that will not be used are likely to cause problems. However, there may be situations where one or more of these techniques might be successfully integrated into the overall project design. (5) Gabion baskets might provide stability needed next to the supports for a modern bridge and provide a transition to other techniques leading to a natural feel where the project blends back into the towpath trail. The programmatic approach should enable sufficient flexibility to use techniques that provide the most effective results for the least cost while at the same time allowing careful and respectful treatment of historic properties.

The issues raised in your correspondence underscore difficulties inherent in the balancing of conservation of natural resources with the management of cultural resources. We recommend that the programmatic environmental assessment (PEA) should provide a philosophical basis integrating different needs of conservation and management under similar purposes. For example, activities of peoples along the Cuyahoga River have resulted in increasing erosion for most of the 10,000 or more years since the retreat of the glaciers. The activities of the past two centuries have been at a much greater scale. Since there has never been a natural Cuyahoga River where people weren't involved in the ecology along the river it will be necessary to include information from cultural resources in developing interpretations of the ecological communities and in formulating conservation strategies. And, as noted above, managing cultural resources certainly requires information on the natural forces that can cause impacts to them. Simply put, it isn't a case of either protecting the environment or protecting the cultural resources. We need to develop integrated approaches that help us do both better. We recommend that the PEA should lead directly to the development of a programmatic agreement to govern the ongoing response to erosion in the Cuyahoga Valley National Park. (3)

What are the goals of this program? The correspondence begins to develop these in ways that are useful and constructive. The PEA should provide additional discussion elaborating on these preliminary ideas. What would you like to see along the towpath 50 years from now? How much of this towpath would you expect to look like it did in 1840? What erosion control measures were used during the period when the canal was in daily use? In those sections where preserving a feel of the time and place of the canal era is important, it is most important to avoid addition of modern elements, including erosion control measures. To this end it might be useful to include information on geological processes and to include review mechanisms within the PEA to forecast areas most likely to see substantial changes in the course of the river. It might prove useful to include consultation with scientists familiar with river geology in developing the PEA. There are a number of prominent scientists working on these issues. You may already have contacted sources. If it might be of help, one source of information that we are aware of in Ohio that you may wish to contact is: (3)(5)(1)

Dan Mecklenburg
Division of Soil and Water Conservation
Ohio Department of Natural Resources
4383 Fountain Square Dr., Building B-3
Columbus, OH 43224
Phone: (614) 265-6610
Email: dan.mecklenburg@dnr.state.oh.us

As you note in your correspondence, there may be places where the river will change its course regardless of our efforts at intervention. What review process will be followed for these areas? What documentation will be required? What efforts will be specified to identify and preserve (or salvage) cultural resources in these areas? If measures are proposed to relocate portions of the towpath trail, what will be the review process that will be followed? What review and preservation measures will be completed prior to the destruction of sections of the towpath or of the railroad line? We suggest that it may be useful for the PEA to include different review processes for emergency projects, direct or case-by-case projects, and long-term or pro-active projects. (3)(7)

We believe that the PEA should include measures for periodic review to incorporate revisions as we learn more about the effects of erosion control measures on cultural resources (and vise versa), as new erosion control strategies and techniques are developed, and as we continue to gain a better understanding of the cultural resources in this area. Also, there may be types of cultural resources located along the river that we don't have a good understanding of today and therefore aren't included in preservation planning, but in the future we may come to recognize the importance of these types of resources and may wish to include them in cultural resource management measures. (10)

Finally, we believe that the Geographic Information System (GIS) capabilities at this office may be of help now and in the future in developing a PEA and in implementing a programmatic response to erosion along the Cuyahoga River. Please feel at liberty to contact us about the information that we can provide.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

David Snyder

David Snyder, Archaeology Reviews Manage
Resource Protection and Review

DMS/ds

MetroParks
SERVING SUMMIT COUNTY
975 TREATY LINE ROAD, AKRON, OHIO 44313-5898
PHONE: (330) 867-5511 FAX: (330) 867-4711
www.summitmetroparks.org

November 5, 2002

Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH 44141

Re: Riverbank Management
Programmatic Environmental Assessment

Dear Ms. Popielski:

We have received the October 15, 2002 letter from John Debo to Keith Shy regarding this program. Metro Parks, Serving Summit County will cooperate with CVNP on this worthwhile project as staff time permits. Metro Parks manages more than 3300 acres within CVNP, in addition to Metro Parks outside the CVNP boundary with river frontage or in the watershed.

Metro Parks supports the idea of a long-range, holistic approach. Rather than reacting to emergencies when there is no choice but to use hard armoring, potential problems can be earmarked and avoided using natural processes and live materials. Where practical, the protected feature may even be relocated to allow the river to takes its natural course.

Please keep Metro Parks, Serving Summit County informed and involved in this initiative. Since Metro Parks has substantial land holdings on the Cuyahoga, as well as other rivers and streams, we would like to obtain a copy of the final report and recommendations. Please address correspondence to Mr. Keith D. Shy, Director/Secretary.

Sincerely,

Paul D. Wilkerson

Paul D. Wilkerson, PE
Construction Supervisor/Civil Engineer

cc: K. Shy, D. Whited

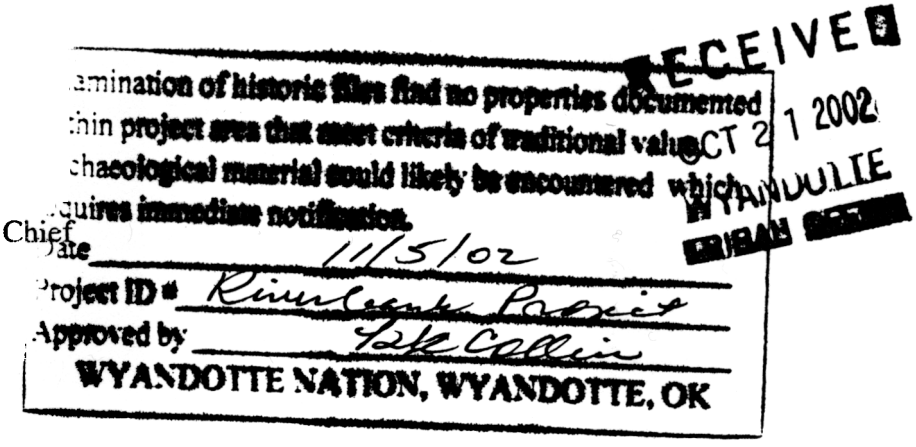
United States Department of the Interior

NATIONAL PARK SERVIC
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

IN REPLY REFER TO:

L76

October 15, 2002



Mr. Leonard Bearskin, Chief
Wyandotte Nation
P.O. Box 250
Wyandotte, OK 74370

RE Cuyahoga Valley National Park
Riverbank Management
Programmatic Environmental Assessment

Dear Mr. Bearskin

The National Park System (NPS) preserves outstanding representatives of the best of America's natural, cultural, and recreational resources of national significance. At Cuyahoga Valley National Park (CVNP), the NPS maintains the Ohio & Erie Canal Towpath Trail and the Valley Railway through the Park. Both of these significant cultural resources are listed on the National Register of Historic Places as Historic Districts. The northern portion of the Ohio & Erie Canal is also listed as a National Historic Landmark. One aspect of maintaining these facilities is to protect them from the erosional effects of the Cuyahoga River, which is also the most significant natural resource within the Park.

The NPS has been repairing areas of streambank erosion on a case-by-case basis by preparing individual, project-oriented Environmental Assessments (EA's). The NPS seeks to develop more holistic and pro-active management measures to address the threat of riverbank erosion on the resources of CVNP. To this end, the NPS is developing a collection of riverbank management measures that will protect the cultural and recreational resources within the Park, while allowing most river processes to continue. To evaluate the potential environmental effects of these measures, the NPS is preparing a Programmatic Environmental Assessment (PEA).

For this study, the NPS has identified two alternatives. One is to continue to manage the threat of riverbank erosion on a project-oriented basis. Streambank erosion repairs would continue to

be implemented only when either the Towpath Trail or Valley Railway is in immediate danger of being closed due to the River's erosion, scour and deposition processes. Such measures, called "direct" measures, would be limited to those that repair the bank immediately adjacent to the threatened feature, and would typically consist of a riprap toe constructed to approximately the mean annual flood elevation, and a variety of bioengineering measures above that point to the top of the eroded bank.

The other alternative is the Riverbank Management Alternative. In addition to constructing direct measures for the highest priority projects, a larger number of less intrusive, direct and indirect measures would be implemented at locations where the progress of riverbank erosion has not yet threatened the Towpath Trail or Valley Railway, but may be expected to threaten these resources in the future. In addition to the direct measures, the Riverbank Management Alternative would apply some or all of the following "indirect" measures:

1. Evaluate if there are locations where moving the Towpath Trail and/or Valley Railway would be a viable option for protecting these recreational resources without causing an adverse effect on cultural resources;

2. Maintain and augment a healthy riparian corridor adjacent to the river's top of bank. Where existing vegetation is sparse or unhealthy, plant native tree species to establish a fully-functional riparian corridor and buffer. Where river oxbows are threatened by meander cutoffs, establish tree screens to stabilize the riverbank;

3. Where erosion is active, but the top of riverbank is located a distance from the resource, utilize large woody debris delivered by the River to slow or halt erosion and to enhance aquatic habitat (root wads, tree revetments, engineered log jams);

4. Where woody debris has become grounded or jammed, and is redirecting flows into the riverbank, reconfigure the debris to direct flow away from the riverbank; and

5. In order to preempt bank erosion and failures, consider the removal of trees that are greater than 9 inches in diameter and greater than 50% undercut and/or are tilted more than 45 degrees.

6. Where conditions permit, experiment with bioengineering techniques and innovative use of rock such as bendway weirs, spurs, and groins.

Certain techniques and materials that **will not be used** for protection of the Towpath Trail or Valley Railway under the Riverbank Management Alternative include pre-cast concrete blocks or articulated mattresses, gabions, sheet piling, and concrete retaining walls. Only natural

materials, such as rock, plantings, and large woody debris, will be visible following construction of these measures.

The attached figure shows the portion of the Cuyahoga River within CVNP. The PEA will include 36 sites located throughout this area. Although 36 sites currently identified, the PEA will address the entire reach of river through CVNP and new areas of concern may be identified in the future.

The PEA will identify and analyze potential impacts to the natural and man-made environment resulting from these alternatives. Issues identified to be analyzed include:

- historic and cultural resources,
- the National Inventory River status of a segment of the Cuyahoga River in the CVNP,
- wetlands,
- floodplains,
- water quality,
- streamflow characteristics,
- federally/state listed endangered or threatened species,
- wildlife,
- visitor experience,
- health and safety factors, and
- aesthetic resources.

The National Park Service intends to be the lead agency for this project in accordance with Section 1501.6 of the Council on Environmental Quality (CEQ) regulations (see http://ceq.eh.doe.gov/nepa/regs/ceq/toc_ceq.htm). Federal and State agencies that have jurisdiction by law or special expertise with respect to any environmental issue are requested to be *cooperating agencies* as described in that section of the CEQ regulations.

As part of the process for determining the scope of issues to be addressed in the PEA, and for identifying the important issues related to the proposed action, we request your comments on these issues and any other issues that you can identify as pertinent. We intend to use your comments to:

Identify the range of alternatives and impacts and the important issues to be addressed in the PEA;

Identify and eliminate from detailed study the issues which are not important or which have been covered by prior environmental review; and

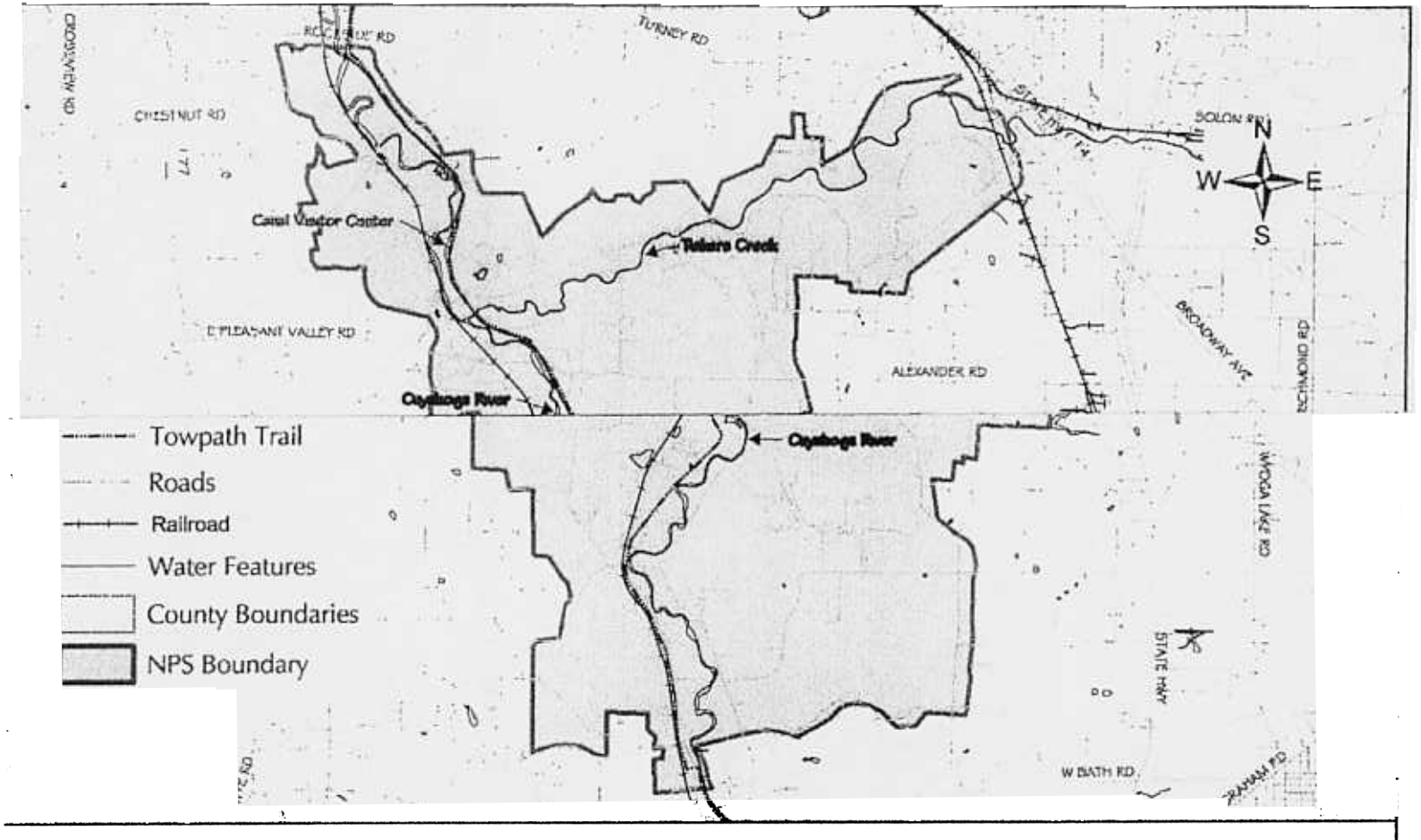
Identify other environmental review and consultation requirements

We look forward to your comments and response to this request. If you have any questions or would like to discuss in more detail the project, please contact Janet Popielski (440) 546-5979. Please forward your comments to Janet by **November 8, 2002**.

Sincerely,

John P. Debo, Jr.
Superintendent

Enclosure



Cuyahoga Valley National Park
Programmatic Riverbank Managment Environmental Assessment Study Area

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
6950 Americana Parkway, Suite H
Reynoldsburg, Ohio 43068-4127

(614) 469-6923
Fax: (614) 469-6919

October 31, 2002

Ms. Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH 44141

Dear Ms. Popielski:

This is in response to your October 15, 2002 letter requesting The U.S. Fish and Wildlife Service's input on a Programmatic Environmental Assessment (PEA) being developed by Cuyahoga Valley National Park (CVNP) for riverbank management projects. The Service is submitting information regarding the occurrence or possible occurrence of Federally-listed threatened or endangered species within the vicinity of CVNP, which is located within Summit and Cuyahoga Counties, Ohio.

The PEA will identify holistic and pro-active management measures to address the threat of riverbank erosion on the resources of CVNP, including the Cuyahoga River itself, the Ohio & Erie Canal Towpath Trail, and the Valley Railway. The Service supports the Riverbank Management Alternative, which would implement direct measures for the highest priority projects and would implement indirect measures to address potential future problem areas. This alternative is preferable over the first alternative, which would address only the high priority projects. The Service supports the initiative to use only natural materials, such as rock, plantings, and large woody debris, in the riverbank stabilization projects.

ENDANGERED SPECIES COMMENTS: CVNP lies within the range of the **Indiana bat** (*Myotis sodalis*), a Federally listed endangered species. Summer habitat requirements for the species are not well defined but the following are thought to be of importance:

1. Dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas.

2. Live trees (such as shagbark hickory) which have exfoliating bark.

3. Stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should the proposed site contain trees exhibiting any of the characteristics listed above, we recommend that they and surrounding trees be saved wherever possible. If they must be cut, they should not be cut between April 15 and September 15.

If desirable trees are present and if the above time restriction is unacceptable, mist net or other surveys should be conducted to determine if bats are present. The survey should be designed and conducted in coordination with the endangered species coordinator for this office. The survey should be conducted in June or July since the bats would only be expected in the project area from approximately April 15 to September 15.

The portion of the park within Summit County lies within the range of the **bald eagle** *(Haliaeetus leucocephalus)*, a Federally-listed threatened species. We recommend that you contact the Ohio Division of Wildlife for the location(s) of the eagle nest(s) in the county. If any nests are located within ½ mile of the project site, further coordination with this office is necessary. If the nest is active, we recommend that

work at the site be restricted from mid-January through July to allow pre-nesting activities, incubation, and raising of the young.

The portion of the park within Summit County also lies within the range of the Federally threatened **northern monkshood** (*Aconitum noveboracense*). The plant is found on cool, moist, talus slopes or shaded cliff faces in wooded ravines. We recommend that the project location be examined to determine if suitable habitat for the monkshood is present. If suitable habitat is found, surveys may be necessary to determine if the plant is present.

The portion of the park within Cuyahoga County lies within the range of the **eastern massasauga** *(Sistrurus catenatus catenatus)*, a docile rattlesnake that is declining throughout its national range and is currently a Federal Candidate species. The snake is currently listed as endangered by the State of Ohio. Your proactive efforts to conserve this species now may help avoid the need to list the species under the Endangered Species Act in the future. Due to their reclusive nature, we encourage early project coordination to avoid potential impacts to massasaugas and their habitat.

The massasauga is often found in or near wet areas, including wetlands, wet prairie, or nearby woodland or shrub edge habitat. This often includes dry goldenrod meadows with a mosaic of early successional woody species such as dogwood or multiflora rose. Wet habitat and nearby dry edges are utilized by the snakes, especially during the spring and fall. Dry upland areas up to 1.5 miles away are utilized during the summer, if available. Some project management ideas include the following:

1) At a minimum, project evaluations should contain delineations of whether or not massasauga habitat occurs within project boundaries. Descriptions should indicate the quality and quantity of massasauga habitat (holes, crayfish burrows, foraging area, or basking sites) that may be affected by the project.

2) In cases where massasaugas are known to occur or potential habitat is rated moderate to high, massasauga surveys may be necessary. If surveys are conducted, it may be helpful to inquire with local resource agency personnel, or reliable local residents, who may know of massasauga sightings. In addition, local herpetologists may have knowledge of historical populations, their habits, and especially the specific local habitats that may contain massasaugas. Surveys should be performed during the periods of spring emergence from dens (usually a narrow window in April or May) and should continue throughout the active season until October. This species is often easiest to locate during the summer months when pregnant females seek open areas in the early mornings, especially after cool evenings. Massasauga biologists recommend that 40 person-hours be spent at each survey locality to confirm the absence or presence of this reclusive species. Recommended survey protocol has been published and should be consulted for further details, as should local experts and literature from previous research and surveys.

> Szymanski, J. A. 1998. Range-wide status assessment for the eastern massasauga (*Sistrurus c. catenatus*). U.S. Fish and Wildlife Service, Fort Snelling, MN, 31 pp. + appendix.
>
> Casper et. al. Recommended standard survey protocol for the eastern massasauga, *Sistrurus catenatus catenatus*. Submitted to Herpetological Review, February 2000.

3) In portions of projects where massasaugas will be affected, clearing and construction activities should occur during the summer when air and ground temperatures are above 65° F. These warm season temperatures allow the snakes to be warm enough to move out of harm's way, if encountered during construction.

4) Maintenance activities (mowing, cutting, burning, etc.) should be conducted during the winter (November 1 to March 15) when snakes are hibernating or during the specified seasonal temperature periods described in the following publication:

> Johnson et al. 2000. The Eastern Massasauga Rattlesnake: A Handbook for Land Managers. U.S. Fish and Wildlife Service, Fort Snelling, MN 55111-4056, 52 pp. + appendix.

The portion of the park within Cuyahoga County lies within the range of the piping plover, a Federally listed endangered species. Due to the project type and location, the project, as proposed, will have no effect

on this species. Relative to this species, this precludes the need for further action on this project as required by the 1973 Endangered Species Act, as amended.

Should additional information on listed or proposed species or their critical habitat become available or if new information reveals effects of the action that were not previously considered, this determination may be reconsidered. If project plans change or if portions of the proposed project were not evaluated, it is our recommendation that you contact our office for further review.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973, as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy.

If you have questions, or if we may be of further assistance in this matter, please contact Megan Seymour at extension 16 in this office.

Sincerely,

Mary Knapp

Mary Knapp, Ph.D.
Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH

Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

Division of Wildlife- District Three
Michael J. Budzik, Chief
912 Portage Lakes Drive
Akron, OH 44319
Phone: (330) 644-2293 Fax: (330) 644-8403

30 October 2002

Matthew D. Wolfe- Fisheries Biologist
Ohio Department of Natural Resources
Division of Wildlife- District 3
912 Portage Lakes Drive
Akron, OH 44319
(330) 644 – 2293 Ext. 3016
matt.wolfe@dnr.state.oh.us

Janet Popielski
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH 44141

Ms. Popielski,

Jeff Herrick, Division of Wildlife District 3 Manager, recently passed a letter down to me from John Debo regarding comments to the Cuyahoga Valley National Parks Programmatic Environmental Assessment (PEA). I would like to speak on behalf of the Ohio Department of Natural Resources, Division of Wildlife, District 3 and make several comments regarding the proposed study.

To begin, I feel as if the PEA would have a much better outcome if it would take the Riverbank Target Alternative versus the "direct" measures mentioned in the letter. Introducing any man-made structures (such as rip rap and sheet pilings) might limit the ability of the Cuyahoga River to serve as a natural system. The Alternative does allow for more natural methods to reduce erosion such as woody debris, a healthy riparian zone, and native tree plantings. These methods will ensure that the river will be a naturally functioning ecosystem for terrestrial and aquatic life.

Secondly, the Cuyahoga Valley National Park is an area of extreme natural wealth and beauty in Northeastern Ohio. Millions of visitors each year are accustomed to seeing an area where the effects of civilization is minimal and the consequences of urban sprawl have not been seen yet. Great care needs to be taken to ensure that this does not change. Options such as the Riverbank Management Alternative will ensure that the effects of humans will be minimized, and this grand natural area will not be impacted by unsightly additions.

Finally, from both a professional and personal view, I would like to assist in any way possible with the proposed study. As a user of the park, an aquatic biologist, and someone who appreciates nature, I understand that this study will be quite interesting, yet very challenging. Hopefully this study will show that if the proper measures are taken, an area such as the Cuyahoga Valley National Park can be modified to serve a purpose, yet still be acceptable to users and non-users of the area. Please feel free to contact me with any additional questions or comments. My contact information is above if you need to send me any information in the future. Thank you.

Sincerely,

Matthew D. Wolfe

Cc: File, P. Hillman, J. Herrick

CUYAHOGA VALLEY NATIONAL PARK
Programmatic Environmental Assessment for Riverbank Management
of the Cuyahoga River

Appendix F

Public Involvement

RESPONSES TO COMMENTS RECEIVED

CUYAHOGA VALLEY NATIONAL PARK
Programmatic Environmental Assessment for Riverbank Management
of the Cuyahoga River

Appendix F - Public Involvement

Responses to Comments Received

1) Clearly identifying and/or addressing the ultimate source and cause of the erosion problem is not feasible in most instances since numerous factors play into the overall reason erosion is occurring. What exists in the system is a combination of natural processes and the river's response to natural and man-induced changes. All potential corrective actions will take into account the cause of the erosion and an effort will be made to address it in the treatment as much as is possible. As projects develop there will be locations where the ultimate cause can be addressed, such as a fallen tree which is deflecting flow into the bank or the presence of highly erodible soils coupled with a lack of vegetation. However, there will be many instances where the overall cause cannot be determined or addressed. Examples are increased flow due to upstream development, absence of an appropriate floodplain and the inability to develop one (such as the section in Peninsula, Ohio), or the presence of bridges. The Programmatic EA does reference on-going research and modeling being developed to predict the responses of rivers to various changes. As stated in the Programmatic EA the Park intends to use new technology and models as they are developed.

   At this time, the Park is continuing to develop the monitoring program for riverbank erosion. As the program and methodology continue to be evolve, the mechanisms and ultimate sources of erosion in the Cuyahoga River Watershed will become clearer. In addition to understanding the overall causes of erosion, the monitoring program will evaluate past projects completed both by the Park and others to determine which techniques perform best. In Section 3.2 it states that the Park will continue to monitor the river migration as part of the preferred alternative. Furthermore, it details that not only will the Park's engineer be consulted on new stabilization projects, but also the Park's natural resource staff will provide additional experience and expertise.

2) As part of the Riverbank Monitoring Program the Park will make an effort to distinguish between natural river activity and those caused substantially by man-induced activity. In some instances human activities will be apparent (i.e. a past project or bridge) and will be addressed accordingly. However, the majority of man-induced contributing factors, such as upstream development, can not be as definitively determined and therefore cannot be addressed by individual projects. Overall the determination of man-made versus natural causes will have little bearing on the approach taken at most sites since the preferred alternative strives to reduce the impacts on the natural river system. The park recognizes that the best approach to managing the erosion along the Cuyahoga is through a watershed approach. The park

as well as other agencies such as the Ohio Environmental Protection Agency (Ohio EPA) has other avenues to address watershed issues such as upstream development, and therefore it is not a component of the Programmatic EA.

3) This comment has been incorporated into the Preferred Alternative. The stepped approach for addressing erosion sites is based on results of a monitoring program and other evaluations. The goal of the decision making process is to provide a balance between the cultural resources and the Cuyahoga River and its tributaries within the Park. In addition, projects will be monitored to determine if a technique is successful and appropriate for continued use on the Cuyahoga River.

4) The Programmatic EA does not presently include any sites where the Cuyahoga River is in close proximity to local roads or other non-NPS facilities. It is sufficient to state here that CVNP is principally concerned with the preservation of its cultural and recreational resources. However, it is (and will continue to be) the practice of CVNP to offer assistance to any local community and to comment on any proposed work within the boundaries of CVNP.

5) The Programmatic EA was developed to provide guidance on management of the riverbank within CVNP. Only a few methods for dealing with an erosion site have been eliminated from this management plan. That is not to say those methods or materials could never be utilized, but only that additional compliance would be required on a case by case basis. Furthermore, as new strategies are developed they will be reviewed for possible use in the program. Encouraging meander cutoffs, restoring floodplains, and riparian buffers are included as possible treatments. Riparian buffers are already being implemented throughout the Park, especially on agricultural lands, and would provide additional riverbank protection.

6) Tributaries are included in the Programmatic EA if a historic, cultural or recreational resource is being threatened by erosion. Projects with the sole purpose of habitat enhancement are not covered under this Programmatic EA but may be undertaken within the Park. Such projects would require separate NEPA compliance.

7) NPS Management Policy, Section 4.6.6 requires that NPS first consider relocating facilities. However, Towpath or Railway relocations would be considered only in cases where the riverbank is encroaching upon the resource, where a short length of relocation is possible, and where costs and cultural resource impacts can be justified. If relocation is a viable option, all potentially affected organizations will be consulted prior to the final decision, including the State Historic Preservation Office in accordance with Section 106 of the National Historic Preservation Act.

8) The OhioEPA has provided the Park with numeric values for sections of the river within CVNP. The data covered chemical and biological water quality data. However, most water quality parameters can be expected to be unaffected by either alternative. Those water quality parameters that could be affected by specific actions

under any of the alternatives include dissolved oxygen, turbidity, temperature, and total phosphorous. These parameters were therefore analyzed in the PEA.

9) All of the agencies listed in this comment have been included on the initial scoping for the PEA and will be sent a copy of the Draft PEA for review during the public review period. CVNP is interested in the formation of a Steering Committee not only to provide input and guidance on National Park Service projects, but all projects which may be undertaken on the Cuyahoga River both inside and outside of the Park boundaries by others. The formation of a Steering Committee is not included in the PEA but will be further evaluated by the Park.

10) NEPA implementation regulations require a review of the programs and documents every five years. Although this PEA provides for the protection of only a fraction of the cultural resources within CVNP, it does not exclude the possibility of protecting currently unknown or unrecognized resources. Such resources can be protected under the anticipated program and addressed by additional NEPA documentation.

11) When removing trees that are in danger of pulling the stream bank it will be standard practice to leave the remaining root wad whenever possible.

12) Archeological resources, both presently known and unknown, within the Park boundaries have been included in the PEA for possible protection as the need arises.